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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JUDITH ANN STYLES,  
LEIGH ANN STYLES,

Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; ROES I thru V,  
and DOES I through X, inclusive,

Defendants.

Case No: 2:17-CV-01197-RFB-PAL

**STIPULATION FOR EXTENSION OF  
TIME TO COMPLETE DISCOVERY  
(FIRST REQUEST)**

COME NOW, the parties above named, by and through counsel, and move the Honorable Magistrate Judge for an Order continuing Discovery and submit the instant Stipulation in accordance with LR 6-1 and LR 26-4. The parties have conferred and agree that an extension of remaining discovery dates (those remaining dates not expired prior to the stay imposed by the Court) is both necessary and warranted following the Plaintiffs' retention of new counsel after its former counsel, George W. Carter, Esq. and co-counsel, David Lee Phillips, Esq. withdrew and various discovery matters were not completed by Plaintiffs due to the issues previously addressed in open Court on November 2, 2016 and December 4, 2017.

No previous requests or extensions for time in which to complete discovery in this matter have been requested.

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1 An extension of time for discovery is necessary and good cause exists for the extension  
2 pursuant to Local Rule 26-4. Pursuant to that Rule, the parties submit the following:

3 **(a) DISCOVERY THAT HAS BEEN COMPLETED**

4 Counsel for the respective parties participated in a discovery planning conference  
5 pursuant to Fed.R.Civ.P. 26(f). Lists of witnesses and document productions were thereafter  
6 exchanged by and between the parties. A Proposed Discovery Plan was filed on June 22, 2017  
7 and Ordered by the Court on June 26, 2017.

8 Written discovery to the Plaintiffs has been served and answered, Plaintiffs' depositions  
9 have been previously scheduled, but those depositions were stayed by the Court Order.  
10 Defendant has disclosed its expert.

11 **(b) DISCOVERY THAT REMAINS TO BE COMPLETED**

12 The parties will be conducting additional factual and expert discovery, including the  
13 depositions of Plaintiffs and of the parties affiliated with Defendant State Farm involved in the  
14 handling of Plaintiff's claim. Plaintiffs and Defendant have agreed that Plaintiffs may disclose  
15 their rebuttal expert as the time to do so had not yet expired when the Stay went into effect and  
16 Defendant shall have the right to supplement its expert disclosure, if necessary.

17 **(c) REASONS DISCOVERY WILL NOT BE COMPLETED WITHIN THE TIME LIMITS SET  
18 BY THE DISCOVERY PLAN**

19 Due to the withdrawal of Plaintiffs' former counsel and retention of new counsel, it has  
20 become necessary to extend the discovery for a period of six months.

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**(d) PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY:**

The parties hereby stipulate and request that discovery dates in this matter be continued for ninety (180) days.

	<b>Current Dates:</b>	<b>Proposed Dates:</b>
Discovery Cut-Off Date:	Dec.25, 2017	June 25, 2018 <sup>1</sup>
Fed.R.Civ.P. 26(a)(2) Disclosures (Experts):	Oct. 26, 2017	Expired
Rebuttal Experts:	November 26, 2017	January 26, 2017
Deadlines to file Dispositive Motions:	January 24, 2018	July 25, 2018
Pretrial Order Due Date:	February 23, 2018	August 24, 2018
Interim Status Report (LR 26-3):	October 26, 2018	May 28, 2018 <sup>2</sup>

Any request to extend the dates set forth in this Discovery Plan and Scheduling Order shall be submitted to the Court not later than 21 days before the expiration of the subject deadline sought to be extended.

**INITIAL DISCLOSURES AND DISCOVERY**

Initial Disclosures have previously been disclosed by both parties. No objections to the Objections to Initial Disclosures were filed. (Fed. R. Civ. P. 26(f)(3)(A)).

The parties anticipate conducting written discovery and depositions on all issues allowed under the Federal Rules of Civil Procedure. (Fed. R. Civ. P. 26(f)(3)(B)).

The parties hereto will submit a stipulated protective order and confidentiality agreement to be filed with the Court prior to the disclosure of Defendant's materials regarding Plaintiff's contractual and extra-contractual claims against Defendant. (Fed. R. Civ. P. 26(f)(3)(D)).

There are currently no issues which parties are aware of regarding discovery of electronically stored information or claims of privilege/protection of trial preparation materials. (Fed. R. Civ. P. 26(f)(3)(C-D)).

<sup>1</sup> 180 Days = Saturday, June 23, 2018 = Monday, June 26, 2018.

<sup>2</sup> 60 days before close of discovery = Saturday, June 23, 2018 = Monday, June 26, 2018

There are currently no changes which should be made in the limitations on discovery imposed by the Federal or Local Rules of practice and no additional orders that this Court should issue at this time. (Fed. R. Civ. P. 26(f)(3)(E-F)).

DATED: December 8, 2017

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**LAW OFFICES OF STEPHEN M. DIXON**

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**ORDER**

IT IS SO ORDERED.

DATED: December 18, 2017

  
UNITED STATES MAGISTRATE JUDGE